

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
OCT 23 2019
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSANNA LEONE,

Defendant.

4:19CR886 SRC

INFORMATION

The United States Attorney charges that:

COUNTS I-V
(WIRE FRAUD: 18 U.S.C. § 1343)

INTRODUCTION

1. At all relevant times, Lampe LP was a family limited partnership owned and controlled by the Lampert family of St. Louis, Missouri located within the Eastern District of Missouri. Lampe LP was created to manage the Lampert family investments.

2. **Defendant Rosanna Leone** was hired by Lampe LP in 2011 to serve as a file clerk and assistant. Defendant Leone was a part-time employee with Lampe LP.

3. Defendant's job duties included manual data entry to the Lampe LP accounting ledger and the filing of records. Defendant Leone was not hired or required to perform any accounting duties on behalf of Lampe LP.

4. By virtue of her duties with Lampe LP, Defendant Leone had access to the account number and routing number for the Lampe LP operating bank account ending in 9348.

5. The Lampe LP operating bank account is located at PNC Bank which processes online ACH (Automated Clearing House) payments through servers located in Richmond, Virginia.

THE SCHEME TO DEFRAUD

6. From in or about September, 2014, through in or about January, 2019, in St. Louis, in the Eastern District of Missouri, the defendant,

ROSANNA LEONE,

devised and intended to devise a scheme to defraud Lampe LP, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

7. During the relevant time period, Defendant Leone knowingly used the account information, specifically the account number and routing number, for the Lampe LP operating bank account ending in 9348 to establish automatic bill payment for her own personal bills and expenses.

8. It was part of the scheme to defraud that the defendant would log onto the website for the entity to which she owed payment, and enter the account number and routing number for the Lampe LP operating bank account as if it were her own for the purpose of paying her personal bills and expenses.

9. It was further part of the scheme to defraud that the defendant also paid the bills, mortgage payments, and college tuition payments of her family members using the Lampe LP operating bank account.

10. At no point during the scheme to defraud did Defendant Leone inform her employer, Lampe LP, that she was using the company's operating bank account to pay her personal bills and expenses and those of her family members.

11. It was further part of the scheme that between in or about September, 2014, and in or about January, 2019, Defendant Leona caused over 400 wire transfers from the Lampe LP operating bank account to various entities to which she or her family members owed payment totaling at least \$120,000.

12. On or about the dates set forth below in each individual count, in St. Louis, Missouri, in the Eastern District of Missouri, the defendant,

ROSANNA LEONE,

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

COUNT	DATE	WIRE TRANSACTION
I	December 4, 2015	\$620.00 ACH transfer from Lampe LP PNC Bank Account to Leone Ameren account
II	February 2, 2016	\$635.42 ACH transfer from Lampe LP PNC Bank Account to Leone MSD account
III	May 2, 2017	\$374.59 ACH transfer from Lampe LP PNC Bank Account to Leone AT&T account
IV	August 2, 2018	\$404.57 ACH transfer from Lampe LP PNC Bank Account to Leone AT&T account
V	October 16, 2018	\$148.93 ACH transfer from Lampe LP PNC Bank Account to Leone Ameren account

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The United States Attorney further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1343 as set forth in Count(s) I-V, the defendant shall forfeit to the United States of America

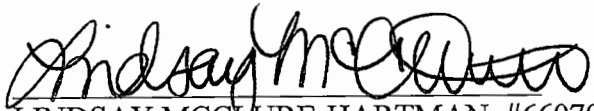
any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violations.

DATED:

10/15/19

JEFFREY B. JENSEN
United States Attorney



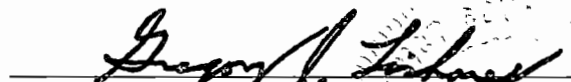
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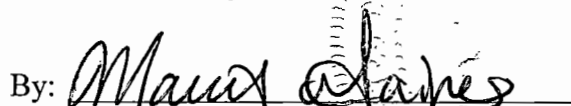
UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Lindsay McClure-Hartman, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.


LINDSAY MCCLOURE-HARTMAN, #66070

Subscribed and sworn to before me this 15th day of October, 2019.


CLERK, U.S. DISTRICT COURT

By: 
DEPUTY CLERK